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February 6, 2006

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: CPNI Compliance Certification
EB Docket No. 06-36
File No. EB-06-TC-060

Dear Ms. Dortch:

Transmitted herewith, pursuant to the Enforcement Bureau's public notices dated January 30 and February 2, 2006, *see Public Notice*, DA 06-223 (Jan. 30, 2006); *Public Notice*, DA 06-258 (Feb. 2, 2006), is a certification and accompanying statement concerning compliance with the Commission's customer proprietary network information rules by Choice One Communications Inc. on behalf of its carrier subsidiaries (as listed in the enclosed document).

In the event there are questions concerning this matter, please contact me.

Very truly yours,

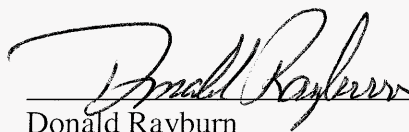
A handwritten signature in black ink, appearing to read "R. Edward Price". The signature is written in a cursive, flowing style.

R. Edward Price

cc (w/encl.): Byron McCoy
Best Copy and Printing

CPNI Compliance Certificate

I certify that I have personal knowledge that Choice One Communications Inc. and its operating subsidiaries listed in the attached report (collectively, "Choice One") have established operating procedures to ensure compliance with Part 64, Subpart U, of the Federal Communications Commission's Rules, 47 C.F.R. §§ 64.2001-64.2009, which implement Section 222 of the Communications Act of 1934, as amended, 47 U.S.C. § 222, regarding CPNI (as defined in the attached report). A statement describing Choice One's efforts to remain compliant is attached to this document.

A handwritten signature in black ink, appearing to read "Donald Rayburn", is written over a horizontal line.

Donald Rayburn
Vice President, Development Marketing
Choice One Communications Inc.

February 6, 2006

Statement Accompanying Annual Compliance Certificate

Pursuant to Section 64.2009 of the Federal Communications Commission's ("Commission's") rules and regulations, 47 C.F.R. § 64.2009, Choice One Communications Inc. has prepared this statement, on behalf of its carrier subsidiaries (collectively referred to herein as "Choice One"),¹ regarding compliance with the Commission's rules pertaining to customer proprietary network information, as defined in Section 222(h)(1) of the Communications Act of 1934, as amended, 47 U.S.C. § 222(h)(1) ("CPNI").

Choice One markets wireline telecommunications services to business customers. It does not market any other types of telecommunications services or to any other types of customers. Choice One does not frequently have a need to use CPNI to market different telecommunications services to its customers. Choice One, however, routinely does the following in relation to CPNI compliance:

- **Employee Training:** Choice One requires all employees to execute confidentiality agreements and educates them on the need to comply with customer confidentiality requirements.
- **Informing Customers:** Choice One informs customers when they sign up for our services of the Commission's CPNI rules and the requirement that CPNI be kept confidential.
- **Customer CPNI Restriction:** Choice One allows customers in its contracts to restrict the use of their CPNI to the extent use of their CPNI may be restricted pursuant to the Commission's CPNI rules.

In the event Choice One decides to conduct a marketing campaign in the future that utilizes CPNI, then Choice One will also do the following:

- **System to Retain Records of Choice One's Sales and Marketing Campaigns:** Choice One will maintain records relating to sales and marketing campaigns that use CPNI for at least one calendar year.
- **Supervisory Review Process for All Sales and Marketing Campaigns:** Choice One supervisors will review sales and marketing campaigns to ensure that they comply with the Commission's CPNI rules. Choice One will retain records of such reviews for one calendar year.

¹ The operating subsidiaries of Choice One Communications Inc. are Choice One Communications International Inc.; Choice One Communications of Connecticut Inc.; Choice One Communications of Maine Inc.; Choice One Communications of Massachusetts Inc.; Choice One Communications of New York Inc.; Choice One Communications of Ohio Inc.; Choice One Communications of Pennsylvania Inc.; Choice One Communications of Rhode Island Inc.; Choice One of New Hampshire Inc.; US Xchange Inc. d/b/a Choice One Communications; US Xchange of Wisconsin, L.L.C. d/b/a Choice One Communications; US Xchange of Indiana, L.L.C. d/b/a Choice One Communications; US Xchange of Illinois, L.L.C. d/b/a Choice One Communications; and US Xchange of Michigan, L.L.C. d/b/a Choice One Communications.

- **Process to Maintain Customer Approvals:** Choice One will implement a system to allow its employees, affiliates, agents, joint venture partners, or independent contractors to determine the status of a customer's approval to use its CPNI, whenever customer approval is required. Under the FCC's rules, Choice One is not required to obtain customer consent to use CPNI in all circumstances. To the extent required, Choice One will obtain customer approvals and retain records of such approvals for one calendar year.
- **Procedures to Communicate Opt-Out Failures to the FCC:** Choice One will have procedures in place to determine when its opt-out procedures are not working effectively. Choice One will notify the FCC by letter within five business days if its opt-out mechanism does not work properly.